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Attorneys for Defendants  
REPOSSESSION SPECIALIST, INC. and PAR, INC. DBA PAR NORTH  
AMERICA

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

JOSEPHINE THORNTON,  
Plaintiff,

v.

ABA RECOVERY SERVICE, INC.,  
PAR, INC. dba PAR NORTH  
AMERICAN, and DOES 1 through 10,  
inclusive,  
Defendants.

**CASE NO.: 15CV1971 CAB KSC**

**NOTICE OF MOTION AND  
MOTION FOR LEAVE TO FILE  
AMENDED ANSWER ON  
BEHALF OF DEFENDANT  
REPOSSESSION SPECIALISTS;  
MEMORANDUM OF POINTS  
AND AUTHORITIES IN  
SUPPORT THEREOF**

Date: April 13, 2016

PER CHAMBERS, NO ORAL  
ARGUMENT UNLESS ORDERED BY  
THE COURT

District Judge: Hon. Cathy Ann  
Bencivengo / Courtroom 4C  
Magistrate Judge: Hon. Karen S. Crawford  
Action Filed: September 3, 2015  
Trial Date: Not Yet Assigned

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE THAT** Defendant REPOSSESSION  
SPECIALIST, INC. will, and hereby does move pursuant to Fed. R. Civ. Proc.  
15(a)(2), for leave to amend its Answer to Plaintiff JOSEPHINE THORNTON's

1 First Amended Complaint to name and appear on behalf of the correct entity,  
2 "REPOSSESSION SPECIALISTS, a California corporation."

3 REPOSSESSION SPECIALIST's motion will be based on this notice, the  
4 attached Memorandum of Points and Authorities, the pleadings and papers on file  
5 herein, and on such further argument and evidence as may be presented at the  
6 hearing on the motion.

7  
8 Dated: March 16, 2016

**FARMER CASE & FEDOR**  
By:

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10  
11 /s/ Anthony T. Case  
12 ANTHONY T. CASE, ESQ.  
13 MICHELE M. ANGELES, ESQ.  
14 Attorneys for Defendant  
15 REPOSSESSION SPECIALIST  
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1 **Case Name:** Thornton v. ABA Recovery Service, Inc., et al.  
2 **Southern District Court of California:** 15CV1971 CAB KSC

3 **DECLARATION OF SERVICE**

4 I hereby declare as follows:

5 I am, and was at the time of service of the papers referred to herein, over the  
6 age of eighteen (18) years, not a party to the action, and employed in the County of  
7 San Diego, State of California. My business address is 402 W. Broadway, Suite  
8 1100, San Diego, California 92101.

9 I caused to be served the following document(s):

10 **NOTICE OF MOTION AND MOTION FOR LEAVE TO FILE  
11 AMENDED ANSWER ON BEHALF OF DEFENDANT  
12 REPOSSESSION SPECIALISTS; MEMORANDUM OF POINTS AND  
13 AUTHORITIES IN SUPPORT THEREOF**

14 of which THE ORIGINAL DOCUMENT OR A TRUE AND CORRECT COPY is  
15 attached hereto, addressed to each such addressee respectively as follows:

16 Alexander B. Trueblood, Esq.  
17 Trueblood Law Firm  
18 10940 Wilshire Blvd., Ste. 1600  
19 Los Angeles, CA 90024  
20 (310) 443-4139 / Fax: (310) 943-2255  
21 alec@hush.com  
22 **COUNSEL FOR PLAINTIFF**  
23 **JOSEPHINE THORNTON**

24 ☒ **BY CM/ECF:** I electronically filed the foregoing document(s) with the Clerk  
25 of the Court using the CM/ECF system, which will send an email notification of  
26 such filing to the person(s) so designated above.

27 ☐ **BY E-MAIL:** I caused said document(s) to be delivered via electronic mail (e-  
28 mail) to the person(s) so designated above.

☐ **BY U.S. MAIL:** I placed each sealed, prepaid envelope for collection and  
mailing at 402 W. Broadway, San Diego, California, 92101. I am readily familiar  
with the business practice for collection and processing of correspondence for  
mailing with the United States Postal Service pursuant to which practice the  
correspondence will be deposited with the United States Postal Service this same  
day in the ordinary course of business.

☐ **BY FACSIMILE:** I caused said document(s) to be transmitted by facsimile  
transmission. The name(s) and facsimile machine telephone number(s) of the  
person(s) served are set forth above. The sending facsimile machine properly  
issued a transmission report confirming that the transmission was complete and  
without error.

☐ **BY OVERNIGHT MAIL:** I caused said document(s) to be deposited in a box or  
other facility regularly maintained by an express service carrier providing overnight  
delivery in an envelope or package designated by the express service carrier with  
delivery fees paid or provided.

1 ☐ **BY PERSONAL SERVICE:** I caused such document(s) to be hand-delivered to  
2 the person(s) served hereunder. A separate Proof of Personal Service will be  
3 provided.

4 I declare under penalty of perjury under the laws of the State of California  
that the foregoing is true and correct. Executed March 16, 2016.

5 /s/ Christina Fedor  
Christina Fedor